



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

January 26, 2017

Ms. Krystal Brown, QEHS Manager
U.S. Ecology Detroit South
1923 Frederick St.
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Brown:

VIOLATION NOTICE

On January 24, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated a complaint of nuisance odors in the vicinity of U.S. Ecology Detroit South, located at 1923 Frederick, Detroit, Michigan. The purpose of the investigation was to determine U.S. Ecology's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Permit to Install (PTI) number 269-04E, and to investigate the complaint received on January 24, 2017, regarding odors in the vicinity of U.S. Ecology Detroit South.

Mr. Todd Zynda of the AQD performed the complaint investigation from approximately 7:45 PM to 8:45 PM on January 24, 2017, and observed the following air pollution violation:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|---|--|
| EUTREATMENT | R 336.1901(b); PTI No. 269-04E, General Condition 6 | Moderate to strong (Level 3 to 4) lime dust and chemical-type odors, attributable to U.S. Ecology's operations, impacting areas downwind of the facility. |
| EUTREATMENT | R 336.1901(b); PTI No. 269-04E, EUTREATMENT, Special Condition III.3 | A steam plume was observed emanating from the Chem-Fix Building throughout the duration of the investigation indicating that negative pressure requirements are not being met. |

R 336.1901(b) states, in part:

“A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property.”

During the investigation of January 24, 2017, Mr. Zynda detected persistent strong to moderate lime dust and chemical-type odors in residential and commercial areas downwind of the facility which were traced back to U.S Ecology Detroit South. In Mr. Zynda’s professional judgment, the odors observed were of sufficient intensity and duration so as to constitute a violation of Rule 901(b) and General Condition 6 of PTI No. 269-04E.

Additionally, throughout the investigation, steam was observed emanating from the Chem-Fix Building. While an open bay door was not observed, the AQD believes that the facility has operational issues at the Chem-Fix Building with the bay doors and associated negative pressure within the building. Special Condition III.3 within EUTREATMENT of PTI No. 269-04E states, in part, that, “the permittee shall maintain negative pressure in the EUTREATMENT building during normal operation.” Normal operation is defined in Special Condition III.2 of EUTREATMENT as “any period that i) material in the treatment vaults is uncovered; ii) material in the treatment vaults has been uncovered for less than two hours; iii) the pug mill is operating or has been operating in the previous two hours; iv) the shredder is operating or has been operating in the previous two hours; or v) any period when hazardous waste has been charged into or discharged from a vault in the previous two hours.”

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 16, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

Please include a list of all waste streams which were processed in the Chem-Fix building on January 24, 2017, including the generator of each waste stream, description of each waste stream, and amount of each waste stream processed.

If U.S. Ecology believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violation cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. LaReina Wheeler, City of Detroit, BSEED
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Thomas Hess, DEQ
Ms. Chris Ethridge, DEQ
Ms. Tracy Kecskemeti, DEQ
Ms. Jeannette Noechel, DEQ
Mr. Richard Conforti, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Todd Zynda, DEQ